

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

THE CITY OF ANNAPOLIS, MARYLAND,	)	
	)	
Plaintiff,	)	Case No. 1:19-cv-01162-GLR
	)	
v.	)	Action Filed: February 26, 2019
	)	Action Served: March 20, 2019
PURDUE PHARMA L.P.; PURDUE PHARMA	)	
INC.; THE PURDUE FREDERICK COMPANY;	)	
TEVA PHARMACEUTICALS USA, INC.;	)	
CEPHALON, INC.; JOHNSON & JOHNSON;	)	
JANSSEN PHARMACEUTICALS, INC.;	)	
ORTHO-MCNEIL-JANSSEN	)	
PHARMACEUTICALS, INC. n/k/a JANSSEN	)	
PHARMACEUTICALS, INC.; JANSSEN	)	
PHARMACEUTICA, INC. n/k/a JANSSEN	)	
PHARMACEUTICALS, INC.; ENDO HEALTH	)	
SOLUTIONS INC.; ENDO	)	
PHARMACEUTICALS INC.; INSYS	)	
TERAPEUTICS, INC.; CARDINAL HEALTH,	)	
INC.; MCKESSON CORPORATION;	)	
AMERISOURCEBERGEN DRUG	)	
CORPORATION; WILLIAM THAM, M.D.;	)	
PHYSICAL MEDICINE AND PAIN	)	
MANAGEMENT ASSOCIATES, P.C.; KOFI	)	
SHAW-TAYLOR; HAPPINESS AGUZIE;	)	
TORMARCO HARRIS; MINNIE NDEM;	)	
STARLIFE WELLNESS CENTER LLC;	)	
LAWRENCE VIDAVER, M.D.; and	)	
MARYLAND HEALING WATERS, LLC f/k/a	)	
MARYLAND HEALING WATERS LLC,	)	
	)	
Defendants.	)	
	)	

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**DECLARATION OF JOHN A. FREEDMAN IN SUPPORT OF  
NOTICE OF REMOVAL PURSUANT TO CIVIL LOCAL RULE 103.5(A)**

I, John A. Freedman, do hereby declare under penalty of perjury as follows:

1. I make this declaration pursuant to Civil Local Rule 103.5(a) in support

Defendants Endo Health Solutions Inc. and Endo Pharmaceuticals Inc.'s Notice of Removal.

2. Attached as Exhibit 1 is a true and correct copy of all documents filed in the state court action (except the Complaint, which was filed with the Notice of Removal), captioned *The City of Annapolis, Maryland v. Purdue Pharma L.P. et al.*, bearing case number C-02-CV-19-000594 in the Circuit Court of Maryland for Anne Arundel County, prior to removal.

DATED: May 3, 2019

/s/ John A. Freedman

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies on this 3<sup>rd</sup> day of May, 2019 I directed that the foregoing to be e-filed with this Court's electronic filing system and thereby served via the Court's ECF filing system on all parties requiring electronic notification.

The undersigned further certifies on this 3<sup>rd</sup> day of May, 2019 I directed that the foregoing be served by first-class mail, postage prepaid to:

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Dated: May 3, 2019

/s/ John A. Freedman

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